

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
CAROLYN J. SHIMP	:	Chapter 13
	:	
Debtor	:	Bankruptcy No. 19-14051 PMM

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Carolyn J. Shimp, through her attorney, David S. Gellert, Esquire, of David S. Gellert, P.C., has filed a Motion to Modify Plan Under § 1329 with the court.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **September 5, 2023**, you or your attorney must file a response to the Motion.** (See instructions on next page.)
3. **A hearing on the Motion is scheduled to be held on **Thursday, September 14, 2023 at 10:00 A.M. in Fourth Floor Courtroom, United States Bankruptcy Court, Gateway Building, 201 Penn Street, Reading, PA 19601.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.**
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's Office at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at:

Clerk's Office of the United States Bankruptcy Court  
Gateway Building, 201 Penn Street, Suite 103  
Reading, PA 19601

9. **If you mail your response** to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same date that you file or mail your response to the Motion, you must mail or deliver a copy of the response to Movant's Attorney:

David S. Gellert, Esquire  
David S. Gellert, P.C.  
3506 Perkiomen Avenue  
Reading, PA 19606  
(610) 779-8000  
Fax: 610-370-1393  
dsgrdg@ptdprolog.net

Dated: August 14, 2023

s/ David S. Gellert  
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David S. Gellert, Esquire  
David S. Gellert, P.C.  
3506 Perkiomen Avenue  
Reading, PA 19606  
610-779-8000  
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